

DRAFT OMB SUPPORTING STATEMENT
FOR NRC FORM 664
GENERAL LICENSEE REGISTRATION
3150-0198

(EXTENSION RENEWAL WITH BURDEN ADJUSTMENT)

Description of the Information Collection

NRC Form 664, "General Licensee Registration," is used by the Nuclear Regulatory Commission (NRC) for the collection of information pertaining to generally licensed devices which are subject to registration. The annual registration criteria are based on radionuclide and the amount of byproduct material contained in the device at the time of purchase. If a generally licensed device contains one or more of the following isotopes, it is subject to an annual registration: 1) 370 megabecquerel (10 millicurie) cesium-137; 2) 37 megabecquerel (1 millicurie) cobalt-60; 3) 37 megabecquerel (1 millicurie) Am-241, or any other transuranic; or 4) 3.7 megabecquerel (0.1 millicurie) strontium-90. The form and instructions will be provided by the NRC to all affected general licensees.

The NRC has developed a standard format, NRC Form 664, "General Licensee Registration," for general licensees to provide the required information. When sent to the general licensee by the NRC, the form will provide available information to the general licensee and requires the general licensee to verify and update the information as necessary. Essential information to be verified/updated on the form consists of: 1) the name, title, and telephone number of the individual responsible for the device; 2) a mailing address and an address of use or storage for the device; and 3) information pertaining to the device such as manufacturer's name, device serial number, device model number, and the isotope and activity contained within the device.

In 2003, the burden estimate was 3,000 responses. Based on the actual number of responses received over the past 3 years, the number of responses in this next clearance package will be 1,000.

A. JUSTIFICATION

1. Need for and Practical Utility of the Information Collection

In the past, general licensees were not contacted by the NRC on a regular basis for information on devices possessed, because of the relatively small radiation risk posed by these devices. However, a number of occurrences involving generally licensed devices suggest better accounting for such devices may be beneficial. For example, one or more cesium gauges were mixed in with scrap metal that was smelted to form steel, and the entire batch of steel was contaminated. There have been other types of incidents involving NRC generally licensed devices; however, loss of accountability remains the most common problem and the predominant concern.

The NRC has concluded that there is a lack of adequate awareness of applicable regulations on the part of the device user and inadequate handling and accounting for these devices. NRC further concluded that these two problems can be addressed by more frequent and timely contact between the general licensee and NRC in the form of a registration program for the higher risk devices. NRC Form 664 is used for the collection of information pertaining to the registration program.

2. Agency Use of the Information

General licensees would be required to submit information periodically which would allow the Agency to better track generally licensed devices, and so that licensees can be contacted or inspected to ensure that the devices can be identified or tracked even if lost or damaged.

3. Reduction of Burden Through Information Technology

There are no legal obstacles to reducing the burden associated with this information collection. The NRC encourages respondents to use information technology when it would be beneficial to them. NRC issued a regulation on October 10, 2003 (68 FR 58791), consistent with the Government Paperwork Elimination Act, which allows its licensees, vendors, applicants, and members of the public the option to make submissions electronically via CD-ROM, e-mail, special Web-based interface or other means. It is estimated that approximately 0% of the potential responses are filed electronically.

Currently NRC scans the form manually or by an automatic batch scanner to upload the information into the general licensing tracking data base.

4. Effort to Identify Duplication and Use Similar Information

There is no duplication of requirements. NRC has in place an ongoing program to examine all information collections with the goal of eliminating all duplication and/or unnecessary information collections.

5. Effort to Reduce Small Business Burden

Because the majority of the general licensees are small businesses, care was taken to require only the minimum amount of information needed in order to assure that the health and safety of the public is protected. In an effort to simplify the process, licensees will be provided with information from the NRC database for verification and correction, rather than being required to provide all information on a blank form. It is not possible to further reduce burden on small businesses by reducing the information collection and still adequately track ownership and disposition of the devices.

6. Consequences to Federal Program or Policy Activities if the Collection is not Conducted or is Conducted Less Frequently

Periodic reporting is essential to assure that devices containing byproduct material are maintained and transferred properly. Less frequent reporting would result in a higher probability of devices being inadvertently discarded, and could lead to a diminished level of protection for the health and safety of the public, and the environment.

7. Circumstances Which Justify Variation From OMB Guidelines

There is no variation from OMB guidelines.

8. Consultation Outside the NRC

The opportunity for the public to comment on this information collection has been published in the Federal Register.

9. Payment or Gift to Respondents

Not applicable.

10. Confidentiality of Information

Confidential or proprietary information is handled in accordance with NRC regulations at 10 CFR 9.17(a) and 10 CFR 2.390(b).

11. Justification for Sensitive Questions

This information collection does not request sensitive information.

12. Estimated Burden and Burden Hour Cost

Approximately 1,000 general licensees are expected to respond to written registration requests from the NRC annually. The average burden per response to these written requests is 20 minutes for an overall estimated annual burden of 333 hours (1,000 x 1/3 hour), and a cost of approximately \$71,262 (333 x \$214/hour).

13. Estimate of Other Additional Costs

There are no other additional costs.

14. Estimated Annualized Cost to the Federal Government

Based on the current estimate of affected licensees, the estimated annualized cost to the Federal Government for registration, as a result of the amendment to 10 CFR 31.5(c)(11) is as follows:

Mailing a request for verification of devices possessed by general licensees and logging the response into the computerized directory or recording that verification has been received, will take approximately 50 hours (1,000 requests @ 3 minutes per request). The annual cost would be approximately \$10,700 (50 hours x \$214 per hour).

It is estimated that approximately 300 general licensees (30%) will call for technical assistance in each round for the next three years. Approximately 15 minutes of staff time will be required to respond to each of about 300 of these requests, or 75 hours. Approximately 30 minutes of staff time will be required to respond to each of the other 200 technical requests, or 100 hours, for a total of 175 hours. Thus, the average cost for technical assistance requests is approximately \$37,450 (175 hours x \$214 per hour).

The total annual average registration cost to the Federal Government estimated for the next three years is \$48,150 (\$10,700 + \$37,450). Note that this does not include the costs associated with the scanning of the returned registrations, nor the resolutions of

those registrations that require significant amount of follow-up or require NRC regional inspections.

This cost is fully recovered through fee assessments to NRC licensees pursuant to 10 CFR Parts 170 and/or 171.

15. Reasons for Changes in Burden or Cost

The change in the overall burden estimate for licensees to register general licensed devices containing radioisotopes on NRC Form 664 has decreased because of a re-estimate of the number of annual responses based on the actual number of responses received during the past 3 years. The number of responses decreased by 2,000 from 3000 to 1,000 resulting in a reduction of 250 hours from 375 to 125 hours.

The hourly rate has increased from \$158 per hour to \$214 per hour in accordance with Part 170.

16. Publication for Statistical Use

None.

17. Reason for not Displaying the Expiration Date

The date will be displayed on the form.

18. Exceptions to the Certification Statement

None.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods are not used in this collection of information.

U. S. NUCLEAR REGULATORY COMMISSION

Agency Information Collection Activities: Proposed Collection: Comment Request

AGENCY: U. S. Nuclear Regulatory Commission (NRC).

ACTION: Notice of pending NRC action to submit an information collection request to OMB and solicitation of public comment.

SUMMARY: The NRC is preparing a submittal to OMB for review of continued approval of information collections under the provisions of the Paperwork Reduction Act of 1995 (44 U.S.C. Chapter 35).

Information pertaining to the requirement to be submitted:

1. The title of the information collection: "General Licensee Registration,"
NRC Form 664
2. Current OMB approval number: 3150-0198
3. How often the collection is required: Annually.
4. Who is required or asked to report: General Licensees of the NRC who possess devices subject to registration under 10 CFR 31.5.

5. The estimated number of annual respondents: 1,000.
6. The number of hours needed annually to complete the requirement or request: 333 hours annually (1,000 respondents x 20 minutes per form).
7. Abstract: NRC Form 664 is used by NRC general licensees to make reports regarding certain generally licensed devices subject to registration. The registration program allows NRC to better track general licensees, so that they can be contacted or inspected as necessary, and to make sure that generally licensed devices can be identified even if lost or damaged, and to further ensure that general licensees are aware of and understand the requirements for the possession of devices containing byproduct material. Greater awareness helps to ensure that general licensees will comply with the requirements for proper handling and disposal of generally licensed devices and would reduce the potential for incidents that could result in unnecessary radiation exposure to the public and contamination of property.

Submit, by (insert date 60 days after publication in the Federal Register), comments that address the following questions:

1. Is the proposed collection of information necessary for the NRC to properly perform its functions? Does the information have practical utility?

2. Is the burden estimate accurate?
3. Is there a way to enhance the quality, utility, and clarity of the information to be collected?
4. How can the burden of the information collection be minimized, including the use of automated collection techniques or other forms of information technology?

A copy of the draft supporting statement may be viewed free of charge at the NRC Public Document Room, One White Flint North, 11555 Rockville Pike, Room O-1 F21, Rockville, MD 20852. OMB clearance requests are available at the NRC worldwide web site: <http://www.nrc.gov/public-involve/doc-comment/omb/index.html>. The document will be available on the NRC home page site for 60 days after the signature date of this notice.

Comments and questions about the information collection requirements may be directed to the NRC Clearance Officer, Brenda Jo. Shelton, U.S. Nuclear Regulatory Commission, T-5 F52, Washington, DC 20555-0001, by telephone at 301-415-7233, or by Internet electronic mail to INFOCOLLECTS@NRC.GOV .

Dated at Rockville, Maryland, this 14th day of September 2006.

For the Nuclear Regulatory Commission.

/RA/

Brenda Jo. Shelton, NRC Clearance Officer
Office of Information Services



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

TO: All New, Current, or Previous Users of Devices Subject to General License Registration
PURPOSE: To Track and Account for Certain Generally Licensed Devices for Public Protection
SUBJECT: ANNUAL REGISTRATION OF GENERALLY LICENSED DEVICES

The U.S. Nuclear Regulatory Commission (NRC) requires annual registration of certain devices that are possessed under the general license issued in Section 31.5 of Title 10 U.S. Code of Federal Regulations (10 CFR 31.5). Devices subject to registration include those containing the radioactive material and activity listed in Table 1. You are receiving this notice because NRC records indicate that you have one or more such devices. Information about the general license registration program is available on the Internet at <http://www.nrc.gov/materials/miau/miau-reg-initiatives/gen-license.html>.

Mail the registration fee (check or money order payable to the USNRC) or credit card authorization and a copy of completed SECTION 1, Page 1 of 2, in the enclosed small envelope to:

U.S. Bank
Accounts Receivable Team
U.S. Nuclear Regulatory Commission
P. O. Box 74514
St Louis, MO 63195-4514

IMPORTANT

YOUR PAYMENT WILL NOT BE CREDITED TO YOUR ACCOUNT UNLESS YOU PUT YOUR GENERAL LICENSE NUMBER (GL-XXXXX-X) ON THE CHECK OR OTHER PAYMENT METHOD. THE GL NUMBER CAN BE FOUND ON SECTION 1, PAGE 1 of 2, IN THE UPPER LEFT CORNER.

Note that under 10 CFR 31.5(c)(11), the attached General Licensee Registration Package must be completed, signed, and returned to the NRC within 30 days from the date of this letter. READ ALL OF THE INSTRUCTIONS PRIOR TO COMPLETING THE PACKAGE. Mail the completed package in the enclosed large envelope to:

U.S. Nuclear Regulatory Commission
ATTN: Accounts Receivable Team
OCFO, Mail Stop T-9 E10
11555 Rockville Pike
Rockville, MD 20852-2738

Registration Fee: Commission regulations (10 CFR 170.31, Category 3Q) require that you submit a registration fee with each registration on an annual basis. The registration fee is subject to change yearly, and you are required to submit the fee that is in effect as of the date of this letter. If you wish to pay by credit card, you need to complete NRC Form 629, "Authorization for Payment by Credit Card." You can obtain NRC Form 629 by accessing the NRC Public Website at <http://www.nrc.gov/reading-rm/doc-collections/forms/nrc629.pdf>. If you are unable to access this information on our Website, or if you have any questions about the fee or payment options, call 301-415-7554.

The REGISTRATION FEE is \$620.00

Enclosures:

1. NRC Form 664, "General Licensee Registration and Instructions"
2. Small envelope
3. Large envelope

**INSTRUCTIONS FOR COMPLETING NRC FORM 664
"GENERAL LICENSEE REGISTRATION"**

Review all six sections of this registration form. If any information is incorrect or missing, make corrections in the applicable boxes. If you have more devices than space provided in the form, **copy the form before starting, as needed.** Use black ink and print using **CAPITAL LETTERS**. Start information in the first box provided. If the information contains a number which contains a dash (-) or a decimal point (.), include the dash or decimal point as an individual character. Use the "Ø" character to represent the number 0 (zero).

Verify information about the devices by reviewing the label on the outside of the device. **For safety reasons, DO NOT TRY TO TAKE APART any device to verify this information.** If you are uncertain how to identify the device's label, contact the device's manufacturer or an authorized service agent for this information. Also contact the manufacturer for any additional information about NRC requirements. You may also review 10 CFR 31.5 and other applicable regulations on the NRC web site at <http://www.nrc.gov/reading-rm/doc-collections/cfr/>, or review specific information about the general licensee project at <http://www.nrc.gov/materials/miau/miau-reg-initiatives/gen-license.html>

Note to specific licensees: If you believe the device(s) listed on the registration form are possessed under your specific license, then verify the device label does not state the device is subject to a general license. If the labels indicate the device is subject to a general license, then complete the registration form as instructed below. If not, complete the registration form as instructed below; however, in Section 2, follow the instructions for "not in possession of device" and complete one Section 4 page per device transferred to your specific license.

Section 1 - General Licensee Information. Provide the requested information about you, the general licensee.

On Page 1, provide the street address/location where your device(s) are used. For portable devices, provide the storage location. P. O. Box addresses are not allowed.

Do not write in the box marked **For NRC Use Only**.

On Page 2, provide the name, telephone number, and title of the individual responsible for your device(s), and a mailing address where correspondence about your device(s) can be sent. The mailing address should be specific to the physical location where the devices are used and/or stored (P.O. boxes may be used if this is the only available mailing address). The individual indicated in this section as responsible for your device(s) must also verify and sign the form in Section 5.

Section 2 - Devices Subject to Registration. This section lists each device subject to registration and in your possession, according to NRC records. Devices subject to registration include those containing at least one of the radionuclides listed in Table 1, with the activity indicated, at the time of manufacture.

Table 1. Criteria for Registration

Radionuclide	Activity greater than or equal to:
Strontium-90	3.7 megabecquerel (0.1 millicurie)
Cobalt-60, Curium-244, Americium-241, Californium-252	37 megabecquerel (1 millicurie)
Cesium-137	370 megabecquerel (10 millicurie)

Use the codes from Table 2 when correcting isotope information for devices in this section. If you do not possess a device on this list, blacken the "not in possession of device" circle, and provide the relevant information in Section 4. Note that each device is assigned a unique six-digit number called the NRC Device Key.

Table 2. Isotope Codes for Sections 2 and 3

Radionuclide	Code for form	Radionuclide	Code for form
Americium-241	AM241	Curium-244	CM244
Californium-252	CF252	Strontium-90	SR90
Cesium-137	CS137		
Cobalt-60	CO60		

Section 3 - Additional Devices. If you have other generally licensed devices (not listed in Section 2) that meet the conditions for registration listed in Table 1, provide information about each additional device. **Before starting copy this section as needed for your additional devices.** Also indicate how you acquired each device by blackening the proper circle.

When entering isotope and unit information for your device(s), use the codes listed in Table 2 of Section 2 for isotope information, and use the codes from Table 3 for unit information:

Table 3. Unit Codes for Section 3

Unit	Code for form	Unit	Code for form
picocurie	PCI	becquerel	BQ
nanocurie	NCI	kilobecurel	KBQ
microcurie	UCI	megabecurel	MBQ
millicurie	MCI	gigabecurel	GBQ
curie	CI	terabecurel	TBQ
pound	LB	microgram	UG
		milligram	MG
kilogram	KG	gram	G

Section 4 - Not in Possession of Device. Use this section to report any devices that are listed in Sections 2 or 6, but that you no longer possess. **Before starting, copy this section as needed for additional devices that are not in your possession.** Enter the NRC Device Key, as listed in Section 2 or 6. Blacken the circle (choose only one) that best describes the disposition of the device and complete the rest of the section as appropriate.

Section 5 - Certification and Signature. The responsible individual must certify, sign, and date Section 5.

Section 6 - Devices Not Subject to Registration. This list contains information about devices that NRC records indicate are in your possession, **but are not subject to registration.** If you no longer have one or more of the listed devices, you are required to make a transfer report to NRC in accordance with 10 CFR 31.5(c)(8) or (9), as applicable. You may use Section 4 for this purpose. This section does not list any static eliminators containing polonium-210 (Po-210), or luminous exit signs containing tritium (H-3). These devices are not subject to registration, and are not included in this section in an effort to reduce the length of this form.

RETURN THE COMPLETED FORM IN THE ENCLOSED LARGE ENVELOPE WITH PROPER POSTAGE.

GL - _____

Date _____

SECTION 2 - DEVICES SUBJECT TO REGISTRATION

Our records indicate that you have these devices. Please update the information as necessary.

NRC Device Key _____ (Internal Control Number)

Distributor/Distributed By:

Grid for distributor information

Distributor License Number:

Grid for distributor license number

Manufacturer Name:

Grid for manufacturer name

Device Model (Not Source Model):

Grid for device model

Device Serial Number:

Grid for device serial number

Not in possession of device (Also complete Section 4)

Transfer Date: MM/DD/YYYY

Grid for transfer date

MM

DD

YYYY

Isotope (e.g., AM241)

Activity (e.g., 100)

Unit (e.g., mCi)

1.

Grid for isotope 1

Grid for activity 1

Grid for unit 1

2.

Grid for isotope 2

Grid for activity 2

Grid for unit 2

3.

Grid for isotope 3

Grid for activity 3

Grid for unit 3

4.

Grid for isotope 4

Grid for activity 4

Grid for unit 4

5.

Grid for isotope 5

Grid for activity 5

Grid for unit 5

6.

Grid for isotope 6

Grid for activity 6

Grid for unit 6



GL - _____ - _____
Date _____

SECTION 5 - CERTIFICATION

I hereby certify that:

- A. All information contained in this registration is true and complete to the best of my knowledge and belief.
- B. A physical inventory of the devices subject to registration has been completed, and the device information on this form has been checked against the device labeling.
- C. I am aware of the requirements of the general license, provided in 10 CFR 31.5.
(Copies of applicable regulations may be viewed at the NRC web site at www.nrc.gov/reading-rm/doc-collections/cfr/)

SIGNATURE - RESPONSIBLE INDIVIDUAL *(Listed in Section 1)*

DATE

WARNING: FALSE STATEMENTS MAY BE SUBJECT TO CIVIL AND/OR CRIMINAL PENALTIES. NRC REGULATIONS REQUIRE THAT SUBMISSIONS TO THE NRC BE COMPLETE AND ACCURATE IN ALL MATERIAL ASPECTS. 18 U.S.C. SECTION 1001 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY WRONG STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER IN ITS JURISDICTION.



